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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAR 10 1983

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

SUBJECT: Authorization to Proceed with Planned Removal Action
at the Calumet Container Site in Hammond, Indiana
ACTION MEMORANDUM

FROM: William N. Hedeman, Jr., Director *Bill Hedeman*
Office of Emergency and Remedial Response (WH-548)

TO: Lee M. Thomas, Acting Assistant Administrator
for Solid Waste and Emergency Response (WH-562-A)

Purpose

The purpose of this memorandum is to request authorization to proceed with a planned removal action at the Calumet Container hazardous waste site in Hammond, Indiana.

Background

The Calumet Container Corporation, a bankrupt drum recycling facility, is located in an urban park with 90% of the site in Hammond, Indiana and 10% of the site in the State of Illinois. The population within a one mile radius of the site is approximately 20,000. The site consists of approximately 18 tons of hazardous and flammable waste materials being stored in various containers such as 55 gallon drums, pails, bulk storage tanks, an open chemical waste trap, and 69 truck trailers. The contents of many containers have been emptied onto the ground, and the trailers are deteriorating and leaking. During heavy rains, contaminated runoff leaves the site. Hammond's air pollution control personnel have observed run-off traveling north along the western boundary of Calumet Container property, flooding 134th Street in Illinois and a major highway in Indiana.

Calumet's drum recycling operations began in the 1960's and terminated with a fire on April 21, 1982. At that time, EPA initiated immediate removal actions to prevent severely contaminated surface water from leaving the site. An estimated 5500 gallons of liquid and 30 cubic yards of sludge were removed

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83.03/21 12:23 P13 - EPA HEADQUARTERS WASH. D.C.

and disposed of off-site for a total Superfund expenditure of \$12,000. However, this site continues to present an increasing risk to persons entering the site. Evidence of vandalism exists; people have been seen on-site rummaging through trailers despite signs posted restricting entry. In light of these risks, on March 2, 1983, the Administrator approved an exemption for this site from the six-month statutory limit for Federal CERCLA removal actions. There have been two recent fires, and Hammond's Fire Department has stated that the site continues to be a fire hazard due to the haphazard storage of flammable materials.

The situation regarding the cost share is complex. Both Indiana and Illinois are capable of and willing to provide the cost share. Our Office of General Counsel and Region V Enforcement personnel are negotiating this issue. As of this writing, it appears that Illinois will provide the cost share while Indiana provides the remaining assurances for the Superfund/State Contract. A letter from Governor Orr of Indiana requesting the planned removal and providing assurances is attached. As usual, no cleanup contract will be awarded until the issue is finally settled.

This site is not listed on the proposed National Priorities List. However, the City of Hammond considers this a high priority site requiring urgent attention because of the threats identified below.

Threat

If response is delayed, local residents would be subjected to increasing risk as follows:

1) Potential direct contact with hazardous substances by the local populace. Access to the site is not restricted, and thus the open chemical waste trap, leaking drums, surface waste pools, and highly contaminated soils present a significant threat of direct contact to nearby residents who have been observed on site. Residents have complained that strong odors are being emitted from the site.

2) Highly contaminated soils at or near surface. Elevated levels of aromatic hydrocarbons, adhesives, paints, metals, waste oils, and flammable liquids are known to be present on the site. Analysis of soil samples from three on-site locations by the Indiana State Board of Health (ISBH) found high levels of arsenic, lead, copper, zinc and organic compounds. Following are some of the concentrations of chemicals measured in the soil: arsenic-180 ppm, lead-540 ppm, zinc-700 ppm and copper 160-ppm. As these soils erode (i.e.- with heavy rainfall) contaminants are carried off the site. For example, some of the hazardous materials have migrated to Powderhorn Lake, which is within 300 ft. of the site, thereby increasing chances of human contact with the contamination.

3) Weather conditions may cause hazardous substances to migrate and pose an even greater threat to public health or the environment. The site is located in an area that generally receives high levels of precipitation during the winter and spring months. Heavy rain or snow would induce migration of contaminated substances from the open chemical trap, drums, and soil into the

14 OF 19

-3-

surrounding area and receiving waters, and increase the potential for human, animal, and food chain exposure. Normal annual precipitation for Indiana and Illinois is usually in the range of 31 inches, but the 1982 level increased substantially to 44 inches. Contaminants are entering the Powderhorn Lake Park area and may endanger park users. Analysis of surface water runoff collected after the April 1982 fire indicated the presence of cyanide at level ranging from 0.025 ppm to 1.9 ppm, which is at least five times the Indiana Water Quality Standard of 0.005 ppm.

4) Serious threat of fire or explosion. The chemicals on site are highly flammable. Ignition of these materials would result in a fire that could endanger 20,000 residents within a one mile radius of the site. Also, during the April 1982 fire, 200 residents were evacuated from their trailer homes due to the danger of smoke and chemical fumes being emitted from the site. The Hammond Fire Department reported that two recent fires were due to unrestricted access and that the site continues to be a fire hazard.

Enforcement Status

Various State and Federal enforcement efforts against the owner/operator have not been successful. The State of Illinois filed a complaint against Calumet Container Corporation in 1979 alleging contamination of groundwater and surface water by the facility. Federal enforcement actions have been filed by the U.S. Attorney against Calumet Container Corporation for failure to respond to a complaint under the Clean Air Act in January, 1982. The case is currently in discovery. In view of the unsuccessful Federal/State enforcement actions to date, it is unlikely that privately financed actions will be forthcoming on a timely basis.

Presently the National Enforcement Investigation Center (NEIC) is reviewing and systematizing a large number of records obtained from the site. Based on this review, additional potentially responsible parties may be identified. The Office of Waste Programs Enforcement has given conditional concurrence to proceed with the planned removal procurement process in parallel with enforcement efforts. If no responsible party cleanup is obtained in a timely manner, OWPE will give a final concurrence for award of a cleanup contract.

Community Relations Plan/Information Release Strategy

The Region has completed their planning for Community Relations and information release to the public. See attached Fact Sheet.

Options Considered

Costs are comparable for all options. Technical feasibility and effectiveness are the variables.

Option A

Physical removal of wastes from containers. Tanking and diking of liquids and mounding of solids inside plastic liners. All waste remains on-site.

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-4-

Effectiveness

This option is poor because discharge of liquids or leachate from solids is inevitable unless long term monitoring and maintenance is continued.

Option B

Physical removal of wastes from containers and incineration of flammables onsite.

Effectiveness

This option does not address the metallic sludges, caustic liquids or contaminated soils. It is not yet technically feasible. EPA has sole mobile incinerator capability at this time, but it is in testing and not yet available for field use.

Option C

Physical removal of wastes from containers, chemical fixation of waste materials, on site storage within a bermed, plastic lined area, and covering with a clay cap.

Effectiveness

This option would require long term monitoring and maintenance. Leachate of waste materials is inhibited but not eliminated.

Option D (Recommended)

Bulk and dispose of all hazardous liquids, solids, and sludges at offsite facilities, with landfill of solids, offsite incineration of flammable liquids, and neutralization of discharge of caustic liquids to a sewage treatment plant.

Effectiveness

This option would reliably eliminate the problem by removing sources of contamination from the site and requiring no followup maintenance.

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83.03/21 12:23 P16 -EPA HEADQUARTERS WASH. D.C.

-5-

Proposed Action (Option D) and Estimated Cost

The following actions will successfully abate the threats to public health and the environment identified above.

Extramural Costs (i.e., contractor)

(A) Bulking and Staging	\$154,035
(B) Disposal of liquids, solids, and soils	22,500
(C) Analysis of liquids, solids, and soils	16,530
(D) Removal of soils	64,140
TOTAL	\$257,205

<u>Intramural Costs</u>	<u>\$ 9,702</u>
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ESTIMATED TOTAL PROJECT COST	\$266,907
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The estimated period of performance for this project is 60 working days.

Recommendation

Based on the nature of the threat present at the Calumet Container site, I recommend your approval of the proposed planned removal action. The proposed actions are expected to successfully abate the threat to public health and the environment. My office will allocate \$258,000 in extramural funds for this action.

Concur: Date: 8/16/83

Nonconcur: _____

Date: _____

Attachment

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Action Memorandum for Calumet Container Site, Hammond, IN

FROM: Gene A. Lucero, Director *Gene A. Lucero*
Office of Waste Programs Enforcement

TO: William N. Redeman, Jr. Director
Office of Emergency and Remedial Response

The Office of Waste Programs Enforcement (OWPE) has reviewed the subject Action Memorandum and concurs that it should be approved. Note that the Enforcement Status Section indicates that notice letters are being sent to responsible parties and negotiations will be conducted.

OWPE has discussed a streamlined approach to negotiations with Region-5 that will allow cleanup to proceed very quickly, whether by the responsible parties or by the fund. Notice letters will indicate that the response action will proceed quickly unless responsible parties agree to undertake it in a short period of time. Any parties giving an affirmative response would be sent an administrative order on consent and a copy of the scope of work and would be informed that very little is negotiable.

Funds should not be obligated until responsible parties have been allowed the opportunity to conduct these actions.

cc: Kirk Sniff, OEC-Waste
Ed Kurent, OEC-Waste
Roger Grimes, Region 5
Richard Bartelt, Region 5

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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MAR - 4 1983

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Authorization to Proceed with Planned Removal Action
at Calumet Container Site, Hammond Indiana
ACTION MEMORANDUM

FROM: Lisa K. Friedman, Acting Associate General Counsel *LF*
Solid Waste and Emergency Response Division (A-131)

TO: William N. Hedeman, Jr., Director
Office of Emergency and Remedial Response (WH-548)

The Action Memorandum from your office has been reviewed by my staff.

I concur _____

I do not concur _____

I concur with the attached conditions ☒ _____

Date MAR - 4 1983

Comments:

Until the cost-share issue is further clarified, paragraphs 2 and 3 on page 2 should be deleted and a more general statement on cost-share substituted.

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